

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

IDA V. CANLAS and OPHELLO S. CANLAS,

Plaintiffs,

v.

JPMORGAN CHASE BANK, N.A.; MUFG
UNION BANK, N.A., and does 1-10,

Defendants.

No. 2:18-CV-01175

FREDERICK A. HAIST'S
DECLARATION IN SUPPORT
OF DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT

Note on Motion Calendar:
November 1, 2019
(without oral argument)

I, Frederick A. Haist, declare as follows:

Identity of Declarant.

1. I am an attorney with the law firm Davis Wright Tremaine LLP ("DWT") and am counsel for Plaintiff JPMorgan Chase Bank, N.A. ("Chase") in this action. I have personal knowledge of the facts set forth herein and, if sworn as a witness, could and would testify competently thereto. I have been one of the principal handling attorneys for this case.

Authentication of Exhibits

Requests for Judicial Notice

2. Chase, in its motion for summary judgment or adjudication, requests the Court judicially notice the Deed of Trust recorded with the King County Recorder's Office. I had an assistant obtain certified copies from the King County Recorder's Office. Attached to the Compendium of Exhibits as **Exhibit 2** is a redacted true and correct certified copy of the

1 recorded Deed of Trust, recorded with the King County Recorder as document
2 #20040524000480.

3 3. Chase, in its motion for summary judgment or adjudication, requests the Court
4 judicially notice the Canlases September 2009 Bankruptcy Petition. Attached to the
5 Compendium of Exhibits as **Exhibit 13** is a redacted true and correct copy of the Canlases
6 September 2009 Bankruptcy Petition. I obtained the document from Pacer.

7 ***Deposition Transcripts***

8 4. Attached to the Compendium of Exhibits as **Exhibit 38** is a true and correct
9 copy of Ophello Canlas's deposition transcript. I took the deposition and it is an accurate
10 transcription.

11 5. Attached to the Compendium of Exhibits as **Exhibit 39** is a redacted true and
12 correct copy of Ida Canlas's deposition transcript. I took the deposition and it is an accurate
13 transcription.

14
15 I declare under penalty of perjury under the laws of the state of Washington and the
16 United States that the foregoing facts are true and correct and this Declaration was executed at
17 Seattle, Washington, this 10th day of October, 2019.

18
19 By /s/Frederick A. Haist
20 FREDERICK A. HAIST

CERTIFICATE OF SERVICE

I hereby certify that on October 10, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorneys of record registered on the CM/ECF system. All other parties (if any) shall be served in accordance with the Federal Rules of Civil Procedure.

DATED this 10th day of October, 2019.

/s/Fred B. Burnside

Fred B. Burnside, WSBA #32491